



## The PGS Privacy Notice for Staff

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## Contents

1.	Purpose of this Privacy Notice .....	3
2.	Who this document applies to .....	3
3.	What Information We Collect.....	3
4.	Why We Collect This Information.....	4
5.	Our Lawful Basis for Processing.....	4
6.	How We Store Your Information .....	7
7.	Who We Share Your Information With .....	7
8.	How Long We Keep Your Data.....	7
9.	Your Rights.....	8
10.	Changes to this notice .....	8
11.	Contact and Complaints .....	8
12.	Allocation of Tasks & Version Control.....	9

## **1. Purpose of this Privacy Notice**

This privacy notice explains how The Portsmouth Grammar School ('the School') collects, uses, stores, and shares personal information about members of staff, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

The School has separate Privacy Notices specifically for the School community and for visitors.

## **2. Who this document applies to**

Academic and other staff, contractors, visiting teachers, casual workers, temporary staff and volunteers who may be employed or engaged by the School to work for it in any capacity, as well as prospective applicants for roles. It also applies to Governors.

This notice is not aimed at pupils, or parents of pupils (whether current, past or prospective) or other members of the public, nor does it inform staff how to handle the personal data of the same. This information may be found in the School's Data Protection Policy.

This Privacy Notice applies alongside any other information the School may provide about a particular use of personal data, for example when collecting data via an online or paper form. It also applies in addition to the School's other relevant terms and conditions and policies, including:

1. any contract between the School and its staff and the Common Room Handbook (now online) and staff-related policies such as the Code of Professional Conduct for Staff
2. the School's CCTV policy
3. the School's Storage and Retention of Records and Documents Policy
4. the School's Safeguarding and Child Protection policies and other linked policies covering matters such as anti-bullying, health and safety including reporting procedures, head injuries and injury reporting
5. the School's IT policies, including its Acceptable Use Policies and Online Safety policies.

Please note that your contract with the School, including any document or policy forming a part of your contractual obligations to the School, may in particular be relevant to and supplement the information in this Privacy Notice for Staff, to the extent that it will contain details of obligations or rights of the School under contract with you which may require the use of your personal data. However, this Privacy Notice is the primary document applicable to the use of your personal data by the School.

This Privacy Notice also applies alongside any other information the School may provide about particular uses of personal data, for example when collecting data via an online or paper form.

## **3. What Information We Collect**

We may collect the following types of personal data about you (and your family members and 'next of kin', where relevant):

1. contact and communications information, including:
  - your contact details (including email address(es), telephone numbers and postal address(es);

- contact details (through various means, as above) for your family members and 'next of kin', in which case you confirm that you have the right to pass this information to us for use by us in accordance with this Privacy Notice;
  - records of communications and interactions we have had with you;
2. biographical, educational and social information, including:
    - your name, title, nationality and date of birth;
    - your image as captured in photographs taken for work purposes;
    - details of your education and references from your institutions of study.
  3. financial information, including:
    - your bank account number(s), name(s) and sort code(s) (used for paying your salary and processing other payments);
    - your tax status (including residence status);
    - Gift Aid declaration information, where relevant;
    - information related to pensions, national insurance, or employee benefit schemes.
  4. work related information, including:
    - details of your work history and references from your previous employer(s);
    - your personal data captured in the work product(s), notes and correspondence you create while employed by or otherwise engaged to work for the School;
    - details of your professional activities and interests;
    - your involvement with and membership of sector bodies and professional associations;
    - information about your employment and professional life after leaving the school, where relevant (for example, where you have asked us to keep in touch with you)

Where this is necessary for your employment or other engagement to work for us, we may also collect or request special categories of data, and information about criminal convictions and offences, including:

1. information revealing your racial or ethnic origin
2. trade union membership, where applicable
3. information concerning your health and medical conditions (for example, where required to monitor and record sickness absences, dietary needs, or to make reasonable adjustments to your working conditions or environment)
4. information concerning your sexual life or orientation (for example, for equality and employment law purposes)
5. information about certain criminal convictions (for example, where this is necessary for due diligence purposes, or compliance with our legal and regulatory obligations)

However, this will only be undertaken where and to the extent it is necessary for a lawful purpose in connection with your employment or other engagement to work for the School.

#### **4. Why We Collect This Information**

In order to carry out its ordinary duties to staff, the School needs to process a wide range of personal data about individuals as part of its daily operation.

#### **5. Our Lawful Basis for Processing**

The lawful bases under the UK GDPR for processing visitor information include:

## 1. Contract

We process your personal data because it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract, such as a contract of employment or other engagement with us. In this respect, we use your personal data for the following:

- administering job applications and, where relevant, offering you a role with us
- carrying out due diligence checks on you, whether during the application process for a role with us or during your engagement with us, including by checking references in relation to your education and your employment history
- once you are employed or engaged by us in any capacity, for the performance of the contract of employment (or other agreement) between you and us
- to pay you and to administer benefits (including pensions) in connection with your employment or other engagement with us
- monitoring your attendance and your performance in your work, including in performance appraisals
- for disciplinary purposes, including conducting investigations where required
- for other administrative purposes, for example to update you about changes to your terms and conditions of employment or engagement, or changes to your pension arrangements
- for internal record-keeping, including the management of any staff feedback or complaints and incident reporting
- for any other reason or purpose set out in your employment or other contract with us.

## 2. Legitimate interests

We process your personal data because it is necessary for our (or sometimes a third party's) legitimate interests. Our "legitimate interests" include our interests in running the School in a professional, sustainable manner, in accordance with all relevant ethical, educational, charitable, legal and regulatory duties and requirements (whether or not connected directly to data protection law). In this respect, we use your personal data for the following:

- providing you with information about us and what it is like to work for us (where you have asked for this, most obviously before you have made a formal application to work for us)
- for security purposes, including by operating security cameras in various locations on the School's premises
- to enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate
- to provide education services to pupils
- to safeguard pupils' welfare and provide appropriate pastoral care
- to carry out or cooperate with any school or external complaints, disciplinary or investigatory process
- for the purposes of management planning and forecasting, research and statistical analysis
- promoting the School to prospective parents and others, including by publishing the work product(s) you create while employed by or otherwise engaged to work for the School
- in connection with organising events and social engagements for staff making travel arrangements on your behalf, where required contacting you or your family members and 'next of kin' for business continuity purposes, to confirm your absence from work, etc.
- publishing your image and likeness in connection with your employment or engagement with us
- to monitor (as appropriate) use of the school's IT and communications systems in accordance with the School's IT acceptable use policy and government guidance such as Keeping Children Safe in Education

## 3. Legal Obligations

We also process your personal data for our compliance with our legal obligations, notably those in connection with employment, charity and company law, tax law and accounting, and child welfare. In this respect, we use your personal data for the following:

- to meet our legal obligations (for example, relating to child welfare, social protection, diversity, equality, gender pay gap monitoring, employment, and health and safety)
- for tax and accounting purposes, including transferring personal data to HM Revenue and Customs to ensure that you have paid appropriate amounts of tax, and in respect of any Gift Aid claims, where relevant
- for the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.

You are under a contractual obligation to provide certain personal data for safeguarding purposes and continuation of employment, refusal to provide this data, could lead to the termination of employment (eg information regarding criminal convictions and DBS checks).

In addition, the School will on occasion need to process **special category personal data** (concerning health, ethnicity, religion, biometrics, or sexual life or orientation) or criminal records information for the reasons set out below.

We will process this data on the basis that such processing is necessary to carry out obligations and exercise rights (both yours and ours) in relation to your employment.

In particular, we process the following types of special category personal data for the following reasons:

- your physical or mental health or condition(s) in order to record sick leave and take decisions about your fitness for work, or (in emergencies) act on any medical needs you may have
- recording your racial or ethnic origin in order to monitor our compliance with equal opportunities legislation
- trade union membership and our obligations as an employer
- categories of your personal data which are relevant to investigating complaints made by you or others, for example concerning discrimination, bullying or harassment
- data about any criminal convictions or offences committed by you, for example when conducting criminal background checks with the DBS, or where it is necessary to record or report an allegation (including to police or other authorities, with or without reference to you).

We will process special categories of personal data for lawful reasons only, including because:

1. you have given us your explicit consent to do so, in circumstances where consent is appropriate
2. it is necessary to protect your or another person's vital interests, for example, where you have a life-threatening accident or illness in the workplace and we have to process your personal data in order to ensure you receive appropriate medical attention
3. it is necessary for some function in the substantial public interest, including the safeguarding of children or vulnerable people, or as part of a process designed to protect others from malpractice, incompetence or unfitness in a role (or to establish the truth of any such allegations)
4. it is necessary for the establishment to exercise or defend legal claims, such as where any person has brought a claim or serious complaint against us or you.

## **6. How We Store Your Information**

The School will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to School systems.

## **7. Who We Share Your Information With**

For the purposes referred to in this privacy notice and relying on the bases for processing as set out above, we may share your personal data with certain third parties. We may disclose limited personal data (including in limited cases special category or criminal data) to a variety of recipients including:

1. other employees, agents and contractors (e.g. third parties processing data on our behalf as part of administering payroll services, the provision of benefits including pensions, IT etc. – although this is not sharing your data in a legal sense, as these are considered data processors on our behalf)
2. DBS and other relevant authorities and agencies such as the Department for Education, TRA, the ICO, Charity Commission and the local authority
3. external auditors or inspectors
4. our advisers where it is necessary for us to obtain their advice or assistance, including insurers, lawyers, accountants, or other external consultants
5. third parties and their advisers in the unlikely event that those third parties are acquiring or considering acquiring all or part of our school
6. when the School is legally required to do so (by a court order, government body, law enforcement agency or other authority of competent jurisdiction), for example HM Revenue and Customs or police.

We may also share information about you with other employers in the form of a reference, where we consider it appropriate, or if we are required to do so in compliance with our legal obligations.

## **8. How Long We Keep Your Data**

Personal data relating to unsuccessful job applicants is deleted as per the details contained in the School's Storage and Retention of Records and Documents Policy except where we have notified you we intend to keep it for longer (and you have not objected).

For employees, subject to any other notices that we may provide to you, we may retain your personal data for a period of 7 years after your contract of employment (or equivalent agreement) has expired or been terminated.

However, some information may be retained for longer than this, for example incident reports and safeguarding or medical files, in accordance with specific legal requirements.

It is the School's current practice to keep employee (current and former) data on Toucan Tech indefinitely - we store contact details, donations and employment information. We do not include special category data. We use it to engage current and former staff with fundraising and events. A link to the Toucan tech Privacy Notice can be found [here](#).

## 9. Your Rights

Under data protection law, you have the right to:

1. Access the information we hold about you
2. Request correction or deletion of your data
3. Object to or restrict our use of your data in some circumstances
4. Withdraw consent if no legal obligations are present which may prevent this
5. Complain to the Information Commissioner's Office (ICO)

## 10. Changes to this notice

The School will update this Privacy Notice for Staff from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

## 11. Contact and Complaints

Data Protection Lead:	Mr John Read (Bursar)
Email address:	<a href="mailto:j.read@pgs.org.uk">j.read@pgs.org.uk</a>
Contact number:	023 9236 4250
Contact address:	The Portsmouth Grammar School, High Street, Portsmouth, Hampshire, PO1 2LN

Data Protection Officer:	GDPR Sentry Limited
Email address:	<a href="mailto:support@gdprsentry.com">support@gdprsentry.com</a>
Contact number:	0113 804 2035
Contact address:	Unit 434 Birch Park, Thorp Arch Trading Estate, Wetherby, LS23 7FG

If you have any questions about how we handle your data or wish to exercise your rights, please contact the Data Protection Lead or the Data Protection Officer.

Alternatively, you can contact the Information Commissioner's Office (ICO) at: <https://ico.org.uk> or call 0303 123 1113.



## 12. Allocation of Tasks & Version Control

### Allocation of Tasks

Task	Allocated to	When / frequency of review
Keeping the policy up to date and compliant with the law and best practice	Bursar	As required, and at least annually
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness	Head of ICT Services	As required, and at least termly
Maintaining up to date records of all information created in relation to the policy and its implementation as required by the GDPR	Head of ICT Services	As required, and at least termly
Receiving / reviewing input from interested groups (such as pupils, staff, Parents) to consider improvements to the School's processes under the policy	School Business Meeting	As required, and at least annually
Formal annual review	SMT	Annually

### Version Control

<b>Date Approved</b>	23 <sup>rd</sup> June 2025 (SMT) (updated 4-9-24)
<b>Date Reviewed</b>	16 <sup>th</sup> June 2025 (School Business Meeting)
<b>Next Review Date</b>	Summer Term 2026
<b>Policy author (SMT)</b>	Bursar / Head of ICT Services
<b>Status</b>	Internal Staff
<b>Report</b>	ICT and Data Report

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